



February 21, 2017

CA Air Resources Board  
Charanya Varadarajan, Manager  
1001 I Street  
Sacramento, CA 95814

CA Environmental Protection Agency  
Arsenio Mataka, Assistant Secretary  
1001 I Street  
Sacramento, CA 95812-2815

**Re: AB 1550 – Defining low-income households for California Climate Investments**

Dear CA Air Resources Board and CA Environmental Protection Agency,

The California Housing Partnership Corporation (CHPC) comments on defining low-income households for California Climate Investments. Aligning programs for low-income multifamily housing will improve participation and performance. CHPC will continue to work with stakeholders to define low-income multifamily housing.

CHPC is a private nonprofit that provides statewide technical assistance and leadership on affordable rental housing finance issues to nonprofit and local government housing agencies. Our 13 financial consultants have helped these agencies leverage more than \$12 billion in public and private financing to create and preserve more than 60,000 affordable rental homes. Our sustainable housing policy experts convene the Green Rental home Energy Efficiency Network (GREEN), a network of over 80 mission-driven affordable rental housing, environmental and sustainable energy organizations working to increase access to energy efficiency, clean energy and water conservation resources for affordable rental properties in California. We also co-lead California's chapter of Energy Efficiency for All, a national partnership dedicated to linking the energy and housing sectors together to tap the benefits of the clean energy economy for millions of low-income families. In California, GREEN and EEFA work together with affordable rental housing property owners and partners to ensure that low-income households benefit from cleaner, healthier and more affordable housing.

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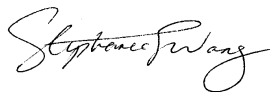
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Aligning energy and water programs specific to low-income multifamily housing will help nonprofit owners and low-income renters reduce greenhouse gas emissions, energy and water use.

1. The California Energy Commission's (CEC) SB 350 Barriers Report recognizes that a major barrier for low-income Californians to participate in residential energy programs is that these programs are generally designed for single-family homeowners, even though 47 percent of low-income households live in multifamily housing<sup>1</sup>. In addition to adopting a definition for low-income households and low-income communities, California agencies should adopt definitions for low-income multifamily housing.
2. The SB 350 Barriers Report recommends that state agencies work together to align eligibility requirements for low-income programs across agencies to streamline access to programs. As Californian agencies implement AB 1550, they should adopt a consistent set of definitions for low-income multifamily housing that aligns with other programs for this sector.
3. CHPC is working with stakeholders to develop a consistent set of definitions for low-income multifamily housing for use across climate, energy and water programs.

More than 1.5 million low-income Californians lack an affordable home. Facing high and rising housing costs, families are forced to make impossible choices between paying rent and other essential needs like transportation, food and healthcare. Programs like the Greenhouse Gas Reduction Fund can make a tremendous difference in the lives of thousands of Californians by enabling innovative energy and water saving solutions to reduce greenhouse gas emission, energy and water costs for nonprofit owners and low-income families living in affordable rental housing.

Sincerely,



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<sup>1</sup> CEC's SB 350 Barriers Report at 29 – [Link](#).